

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TENNESSEE
AT KNOXVILLE**

KNOX TRAILERS, INC.)	
)	
and)	
)	
POST TRAILER REPAIRS, INC.,)	
)	
Plaintiffs,)	
)	
v.)	No. 3:20-cv-137
)	
JEFF CLARK, individually;)	JURY TRIAL DEMANDED
AMY CLARK, individually;)	
PAUL HENEGAR, individually;)	
ROY BAILEY, individually;)	
BILLY MAPLES, d/b/a TITAN TRAILER)	
REPAIRS & SALES, LLC;)	
BILLY MAPLES, individually.; and)	
AMANDA MAPLES, individually;)	
)	
and)	
)	
TITAN TRAILER REPAIRS & SALES, LLC.)	
)	
Defendants.)	

PLAINTIFFS' MOTION FOR ENTRY OF PROTECTIVE ORDER

Plaintiffs Knox Trailers, Inc. and Post Trailer Repairs, Inc. (collectively, "Plaintiffs"), pursuant to Rule 26(c) of the Federal Rules of Civil Procedure, hereby file this Motion for Entry of Protective Order. A [Proposed] Protective Order is attached as **Exhibit A**. Plaintiffs rely on their contemporaneously filed Memorandum of Law in Support and state as follows:

1. Discovery in this action has and will involve the disclosure of trade secrets and other confidential and proprietary business, technical, and financial information.
2. Defendants have also indicated that the entry of a protective order is necessary. A copy of what Plaintiffs believe to be the version of the protective order that is acceptable to

Defendants is attached as **Exhibit B**. A comparison version of Exhibits A and B that shows the disagreements between the Parties is attached as **Exhibit C**.

3. Accordingly, Plaintiffs, in good faith, sought a stipulated proposed protective order from Defendants before filing this Motion, but Defendants proposals have not included meaningful and reasonable measures of protection for Plaintiffs. (See communications attached as **Exhibit D** and **E**).

WHEREFORE, Plaintiffs respectfully request that this Court enter Plaintiffs' [Proposed] Protective Order, which is attached as Exhibit A.

Dated: November 11, 2020

Respectfully submitted,

/s/ Jimmy G. Carter, Jr.
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CERTIFICATE OF SERVICE

I certify that a copy of the foregoing was filed electronically. Notice of this filing will be sent by operation of the Court's electronic filing system to all parties indicated on the electronic receipt. All other parties will be served by regular U.S. mail. Parties may access this filing through the Court's electronic filing system.

/s/ Jimmy G. Carter, Jr.
Jimmy G. Carter, Jr., BPR # 032026